

Exhibit B

From: [Lollar, Tirzah](#)
To: [Andrew Stephens](#); [Martin, Meghan C.](#); [Raymond Winter](#)
Cc: [Eugenia Krieg](#); [Drew Wright](#); [Sinty Chandy](#); [Christopher Hilton](#); [Amy Hilton](#); [Benjamin Walton](#); [Heather Hacker](#); [Sheehan, Christian](#); [Odell, Christopher M.](#); [Margolis, Craig D.](#); [zzz.External.lgodesky@omm.com](#); [brown@blackburnbrownlaw.com](#); [zzz.External.jchapa@omm.com](#); [Michael Moore](#); [zzz.External.dashby@omm.com](#); [Weberman, Melissa L.](#)
Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al
Date: Wednesday, September 7, 2022 1:03:49 PM
Attachments: [image002.png](#)
[Planned Parenthood Affiliate Search Report 20220907- First Sets of RFPs.pdf](#)
[image001.png](#)

Attached please find information on Affiliates' collections, searches, and productions. We are performing additional validation of our predictive coding model and will provide information on that process in a few days.

Ray and TX team, we are still waiting to receive your list of custodians and would appreciate an update on Texas's efforts to collect and produce documents.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)



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Washington, DC 20001-3743
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Tirzah.Lollar@arnoldporter.com
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From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Sent: Friday, September 2, 2022 3:50 PM
To: Andrew Stephens <andrew@hackerstephens.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; brown@blackburnbrownlaw.com; zzz.External.jchapa@omm.com <jchapa@omm.com>; Michael Moore <Michael.Moore@oag.texas.gov>; zzz.External.dashby@omm.com <dashby@omm.com>
Subject: Re: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Ray and TX teams, please send us your custodians as agreed last week.

Our vendor is still working to pull the info that we discussed regarding Affiliates' collections and searches with the TX folks and Andrew last week. We should be able to send it on Tuesday.

Thanks,
Tirzah

Sent from Nine

From: Lollar, Tirzah
Sent: Monday, August 29, 2022 5:04 PM
To: Andrew Stephens; Martin, Meghan C.; Raymond Winter
Cc: Eugenia Krieg; Drew Wright; Sinty Chandy; Christopher Hilton; Amy Hilton; Benjamin Walton; Heather Hacker; Sheehan, Christian; Odell, Christopher M.; Margolis, Craig D.; zzz.External.lgodesky@omm.com; brown@blackburnbrownlaw.com; zzz.External.jchapa@omm.com; Michael Moore; zzz.External.dashby@omm.com
Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Ray and TX team, are you willing to identify the custodians that Texas is searching? We think it makes sense for the parties to share this information, provided that everyone agrees to share it.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)



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Tirzah.Lollar@arnoldporter.com
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From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Monday, August 29, 2022 2:32 PM
To: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Cc: Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Sheehan,

Christian <Christian.Sheehan@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; brown@blackburnbrownlaw.com; zzz.External.jchapa@omm.com <jchapa@omm.com>; Michael Moore <Michael.Moore@oag.texas.gov>; zzz.External.dashby@omm.com <dashby@omm.com>
Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

External E-mail

Meghan, could you provide the names of the 8 custodians referenced in your email?

Thanks,

Andrew

From: Andrew Stephens
Sent: Friday, August 26, 2022 1:32 PM
To: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Cc: Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; lgodesky@omm.com; brown@blackburnbrownlaw.com; jchapa@omm.com; Michael Moore <Michael.Moore@oag.texas.gov>; dashby@omm.com
Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Tuesday 10am CST works, dial-in info below.

Andrew

Andrew Stephens is inviting you to a scheduled personal audio conference.

Topic: Andrew Stephens' Personal Audio Conference
Passcode: 030527

Join via URL: <https://us06web.zoom.us/join/3813009255>
Passcode: 030527

Or One tap mobile (US Toll Free): 8335480282,,3813009255#,,,*030527#

Or join by phone:

833 548 0282 (US Toll Free)
+1 253 215 8782 (US Toll)
+1 301 715 8592 (US Toll)
+1 312 626 6799 (US Toll)
+1 346 248 7799 (US Toll)
+1 646 558 8656 (US Toll)
Conference ID: 381 300 9255
Passcode: 030527

From: Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto: Meghan.Martin@arnoldporter.com)>

Sent: Friday, August 26, 2022 11:32 AM

To: Andrew Stephens <[andrew@hackerstephens.com](mailto: andrew@hackerstephens.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto: Raymond.Winter@oag.texas.gov)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto: Tirzah.Lollar@arnoldporter.com)>

Cc: Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto: Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto: Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto: Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto: Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto: Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto: Benjamin.Walton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto: heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto: Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto: Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto: Craig.Margolis@arnoldporter.com)>; [lgodesky@omm.com](mailto: lgodesky@omm.com); [brown@blackburnbrownlaw.com](mailto: brown@blackburnbrownlaw.com); [jchapa@omm.com](mailto: jchapa@omm.com); Michael Moore <[Michael.Moore@oag.texas.gov](mailto: Michael.Moore@oag.texas.gov)>; [dashby@omm.com](mailto: dashby@omm.com)

Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Andrew -

Today doesn't work and Monday is not great. Are you available on Tuesday? We can do 11-2 ET or anytime after 3 ET on Tuesday.

Meghan

Meghan Martin

Attorney and Advisor | [Bio](#)



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Washington, DC 20001-3743
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From: Andrew Stephens <[andrew@hackerstephens.com](mailto: andrew@hackerstephens.com)>

Sent: Thursday, August 25, 2022 6:49 PM

To: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Cc: Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; brown@blackburnbrownlaw.com; zzz.External.jchapa@omm.com <jchapa@omm.com>; Michael Moore <Michael.Moore@oag.texas.gov>; zzz.External.dashby@omm.com <dashby@omm.com>

Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

External E-mail

Thank you, Meghan. Is there a time tomorrow or Monday when we could have a call to meet and confer regarding the review and document production?

Andrew

Andrew B. Stephens
Partner

www.hackerstephens.com

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From: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>

Sent: Thursday, August 25, 2022 11:00 AM

To: Raymond Winter <Raymond.Winter@oag.texas.gov>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Andrew Stephens <andrew@hackerstephens.com>

Cc: Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>

lgodesky@omm.com; brown@blackburnbrownlaw.com; jchapa@omm.com; Michael Moore
<Michael.Moore@oag.texas.gov>; dashby@omm.com

Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Ray and Andrew:

In response to Texas providing their search terms, Affiliate Defendants are providing similar information. In preparing to respond to Texas's and Relator's First Sets of RFPs, the Affiliates Defendants identified 8 custodians who would have emails and documents responsive to those requests. Those custodians' full mailboxes were collected and once the mailboxes were loaded to Affiliates Defendants' vendor's processing platform, the attached list of search terms were used to determine the search universe. The search hits produced approximately 36,000 emails with families to be reviewed. Those documents were reviewed and responsive non-privileged documents have been produced in the rolling production made by Affiliates Defendants.

During the course of review, Affiliates Defendants learned that the full mailboxes of 2 of the 8 custodians were not initially collected correctly. Those mailboxes were recollected and upon running search terms, resulted in a new universe of approximately 77,000 emails with families from those 2 custodians. Prior to the Court's issuance of the Order [Dkt. 139] adopting the parties' stipulation and proposed order regarding production of electronically stored information and hard copy documents, Affiliate Defendants decided to use the Continuous Active Learning ("CAL")/TAR methodology to use the coding from the initial set of 36,000 emails to determine what percentage of the 77,000 would be review. CAL was then used to go through 3 more rounds of review to determine if more documents needed to be reviewed. Any responsive non-privileged documents from the set of reviewed documents have been produced in our rolling productions made by Affiliates Defendants.

Please let me know if you have any questions or if you would like to discuss further.

Regards,
Meghan

Meghan Martin

Attorney and Advisor | [Bio](#)



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From: Michael Moore <Michael.Moore@oag.texas.gov>

Sent: Wednesday, August 3, 2022 6:02 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com

<dashby@omm.com>

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>; Heather Hacker <heather@hackerstephens.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; brown@blackburnbrownlaw.com; zzz.External.jchapa@omm.com <jchapa@omm.com>

Subject: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

External E-mail

Tirzah and Danny –

Thank you again for taking the time to confer with us Monday and yesterday. Pursuant to our discussion, Texas will search custodial files for relevant HHSC and HHSC-OIG witnesses using the attached search terms. We have asked HHSC to begin the searches using the attached terms. We remain available to meet and confer about the terms. Please let us know if you would like to discuss.

Sincerely,

Michael J. Moore
Assistant Attorney General
Civil Medicaid Fraud Division
(512) 936-1449
michael.moore@oag.texas.gov

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this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:

<http://www.arnoldporter.com>

[illegible]

*Custodian value identifies a single custodian [Custodian metadata field], not all custodians included on the communication [CustodianALL and DupeCustodian metadata fields]

DATE CULL January 31, 2011 to January 6, 2022

Search Term	Total Documents Hit	Unique Hits
Medi-caid	8	0
hhs.tx.gov	0	0
dhh.Louisiana.gov	31	0
Wachino	18	0
Kleibert	3	1
DHH	415	146
"qualified provider"	603	4
FFS	785	76
"provider agreement"	1,410	234
HHSC-OIG	530	0
MCO	1,678	54
Overpayment	1,817	109
"Cecile Richards" AND (termination OR medicaid OR texas OR louisiana)	6,862	3,592
"grace period"	1,163	254
"en banc"	1,505	75
repay*	3,367	1,174
revocation OR revoke	3,510	575
"Fee for service" OR fee-for-service	2,905	530
OIG	5,174	1,112
TRO	2,926	731
Centers w/5 (Medicare OR "Medicaid services")	4,569	5
Recoup*	2,318	431
"Managed care"	11,138	2,335
"fifth circuit"	5,127	1,026
HHS	12,794	2,452
TMHP	5,336	1,431
HHSC	7,265	897
CMS	12,607	3,525
Health w/2 "human services"	15,950	3,079
injunct*	11,138	2,284
(Medicaid AND (enroll* OR participat* OR eligibil* OR accred* OR submit* OR submission OR receiv* OR receipt OR terminat* OR qualif* OR refund*))	42,726	25,120

51,252